

ABSTRACT

[0075] A convertible security may include a maturity component, a conversion component, a contingent component, and a remarketing component. In general, the maturity component provides a maturity term of the convertible security. The conversion component provides terms and conditions for exchanging the convertible security for another asset. The contingent component provides one or more payment contingencies triggered upon the occurrence of one or more specified conditions. The remarketing component provides terms and conditions for remarketing the convertible security to new investors. After remarketing, the convertible security remains outstanding and potential recapture of excess tax benefits is postponed until the convertible security ceases to be outstanding.